

3. On December 18, 2014, I executed my initial affidavit (the “December Affidavit”) that was filed with the Court on December 30, 2014, testifying to my knowledge of, among other things, the mailing of the Notice Packets and the receipt of requests for exclusion and objections from the Class as of December 15, 2014.

UPDATE ON MAILING OF NOTICE PACKETS

4. As more fully stated in my December Affidavit (at ¶12), as of December 15, 2014, Rust had mailed a total of 6,832 Notice Packets to potential Class Members and nominees.

5. Since my December Affidavit was executed, during the period from December 15, 2014 through January 7, 2015, inclusive, in response to correspondence or inquiries from potential Class Members and/or nominees, Rust has caused an additional 206 Notice Packets to be mailed to potential Class Members and nominees.

6. Therefore, as of January 23, 2015, we have mailed a total of 7,038 Notice Packets to potential Class Members and nominees.

SETTLEMENT WEBSITE AND TELEPHONE HOTLINE

7. As stated in my December Affidavit (at ¶16), Rust posted the Notices, Publication Notices, Claim Form, Plan of Allocation, Amended Stipulations and Notice Orders, among other documents, on a website dedicated to the Settlement (www.IndyMacMBSclassaction.com). As of January 23, 2015, the website was visited at least 49,323 times.

8. Rust has maintained a toll-free telephone number to provide pre-recorded information to potential Class Members and informational requests, as stated in my December Affidavit (at ¶19). As of January 23, 2015, a total of 146 potential Class Members who requested assistance were transferred to live operators.

RECEIPT OF REQUESTS FOR EXCLUSION, OBJECTIONS AND CLAIM FORMS

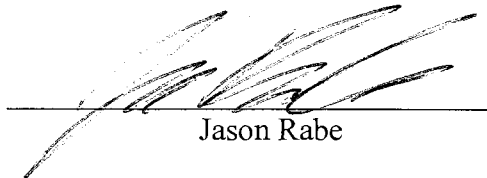
9. As stated in ¶20 of my December Affidavit, pursuant to ¶13 of the Underwriter Defendant Notice, Requests for Exclusion from the Underwriter Defendant Settlement Class were required to be received by Rust no later than January 13, 2015. To date, Rust has received a total of 6 Requests for Exclusion from the Underwriter Defendant Settlement Class. Attached hereto as Exhibit A is a complete listing of the name, city, state and Rust's internal tracking number of the 6 Requests for Exclusion from the Underwriter Defendant Settlement Class received to date. Attached as Exhibit B are copies of the 6 Requests for Exclusion which, for privacy reasons, have been redacted.

10. Complete copies of all 6 Requests for Exclusion, including all supporting documentation, and a copy of each envelope or express label, were provided to Lead Counsel.

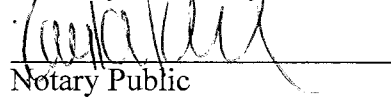
11. As stated in my December Affidavit (at ¶23), objections and/or comments must be filed with the Court and delivered to Lead Counsel and Counsel for Underwriter Defendants no later than January 13, 2015. As of January 23, 2015, Rust has not received any objections and/or comments.

12. Pursuant to ¶22 of the Underwriter Notice Order and ¶17 of the Supplemental Notice Order, Claim Forms must be postmarked no later than January 28, 2015. As of January 23, 2015, Rust has received 1,663 Claim Forms.

13. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.


Jason Rabe

Sworn to before me this
26th day of January, 2015


Notary Public

